

***United States District Court***

**DISTRICT OF NEW HAMPSHIRE**

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**United States of America**

**v.**

**Ian Freeman**

**CASE NUMBER: 1:21-cr-000041**

**RESPONSE TO THE UNITED STATES' GOVERNMENT'S REPLY TO  
DEFENDANT'S OBJECTION REGARDING DOC NO. 207**

NOW COMES the Defendant, Ian Freeman, by and through counsel, and replies to the United States' government's most recent filing concerning Doc. 207 in this case. The Defendant states as follows:

1. The material is highly relevant and would neither prejudice nor lead to confusion.
2. The offered material addresses the subject matter of this prosecution and was known to the Defendant during the relevant time period covered by the indictment.
3. The opinion letter offered by the Defendant and drafted by his attorney refers to the "Church" being required to register as a money transmitting business generally refers to both state and federal law.
4. The letter does not limit its opinion solely to the vending machine aspect only.
5. The letter most certainly refers to the vending machines, but also refers to the activity in which the Church is engaged in.
6. There is nothing irrelevant nor misleading. The allegation concerning a "laches-type argument" is pointless.

Respectfully Submitted,

**November 1, 2022**

*Date*

/s/ Mark L Sisti

*Signature*

Mark L. Sisti

*Print Name*

387 Dover Road

*Address*

Chichester, NH 03258

*City*

*State*

*Zip Code*

(603) 224-4220

*Phone Number*

**CERTIFICATION**

I hereby certify that a copy of this reply was forwarded to Seth Aframe, Esq. and Georgiana MacDonald, Esq of the U.S. District Attorney's Office, electronically through EFC on November 1, 2022.

**November 1, 2022**

*Date*

/s/ Mark L Sisti

*Signature*

Mark L. Sisti

*Print Name*